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*Counsel for Defendants Premier Orthopaedic and Sports Medicine Associates of Southern New Jersey, LLC, trading as Premier Orthopaedic Associates, Premier Orthopaedic Associates Surgical Center, LLC, Kimberly Yvette Smith, M.D., a/k/a Kimberly Yvette Smith-Martin, M.D., Thomas Dwyer, M.D., Rhaul Shah, M.D., John Catalano, M.D., Richard C. DiVerniero, M.D., and Richard Strauss, M.D.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS  
LIABILITY  
LITIGATION

THIS DOCUMENT RELATES TO:  
  
ALL CASES

MDL No. 2419  
Docket No. 1:13-md-2419 (RWZ)

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**PREMIER ORTHOPAEDIC ASSOCIATES, ET AL'S NOTICE OF A 10-DAY  
EXTENSION TO RESPOND TO VANDERBILT AND EMORY'S MOTIONS TO  
QUASH**

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Defendants Premier Orthopaedic and Sports Medicine Associates of Southern New Jersey, LLC, trading as Premier Orthopaedic Associates, Premier Orthopaedic Associates Surgical Center, LLC, Kimberly Yvette Smith, M.D., a/k/a Kimberly Yvette Smith-Martin, M.D., Thomas Dwyer, M.D., Rhaul Shah, M.D., John Catalano, M.D., Richard C. DiVerniero, M.D., and Richard Strauss, M.D. (collectively, "Premier Defendants"), hereby move the Court for a ten-day extension,

pursuant to MDL Order No. 11 (Docket Number (“Dkt. No.”) 1524) to respond to The Emory Clinic, Inc.’s (“Emory”) Motion to Quash (Dkt. Nos. 2777, 2778, 2779, 2780) filed April 1, 2016.

The Premier Defendants also move the Court under MDL Order No. 11 for a ten-day extension to respond to The Vanderbilt University’s (“Vanderbilt”) Motion to Quash (Dkt. Nos. 2781, 2782, 2783, 2784) filed April 1, 2016.

This is the first request for extension to respond to these filings and the Premier Defendants are requesting a ten day extension. Accordingly, the Premier Defendants’ new deadline to respond is April 21, 2016.

Dated: April 6, 2016

Respectfully submitted,

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**CERTIFICATION**

I certify that in submitting this *NOTICE*, I caused a copy of the above to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's System, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: April 6, 2016

/s/ Christopher M. Wolk  
Christopher M. Wolk, Esq.